

Equality Impact Assessment

Shopmobility Scheme

- **Background**

An Equality Impact Assessment is an improvement tool. It will assist you in ensuring that you have thought about the needs and impacts of your service/policy/function in relation to the protected characteristics. It enables a systematic approach to identifying and recording gaps and actions.

- **Legislation- Equality Duty**

As a local authority that provides services to the public, Charnwood Borough Council has a legal responsibility to ensure that we can demonstrate having paid due regard to the need to

- ✓ Eliminate discrimination, harassment, victimisation.
- ✓ Advance Equality of Opportunity
- ✓ Foster good relations

For the following protected characteristics:

- ✓ Age
- ✓ Disability
- ✓ Gender reassignment
- ✓ Marriage and civil partnership
- ✓ Pregnancy and maternity
- ✓ Race
- ✓ Religion and belief
- ✓ Sex (Gender)
- ✓ Sexual orientation
- ✓ Socially excluded groups

What is prohibited?

- ✓ Direct Discrimination
- ✓ Indirect Discrimination
- ✓ Harassment
- ✓ Victimisation
- ✓ Discrimination by association
- ✓ Discrimination by perception
- ✓ Pregnancy and maternity discrimination
- ✓ Discrimination arising from disability
- ✓ Failing to make reasonable adjustments

Complete this action plan as you go through the questions

- **Step 1 – Introductory information**

Title of the policy	Closure of Shopmobility, Loughborough
Lead officer and others undertaking this assessment	Sylvia Wright
Date EIA started	1 December 2021
Date EIA completed	10 February 2022

- **Step 2 – Overview of policy/function being assessed**

Outline: What is the purpose of this policy? (Specify aims and objectives)

The Head of Leisure Services has reviewed the Shopmobility service provision in Loughborough and concluded that following a two- year period of closure that this service would not be resumed due to budget and safety reasons.

The Council's draft budget includes a proposal to not reintroduce the suspended Shopmobility service due to the additional complications of running this service from the current premises and the ongoing resources available to the Council.

Unfortunately, over the past 5 years the cost of the service has increased while the usage has declined by around 75% to less than 12 regular users.

Out of the 12 regular users sadly some of the users have passed away and others are no longer contactable. Only a handful of users would still be able to access the scheme due to their own personal circumstances, i.e., one is in a home outside of the area or their level of independence or mobility has reduced, and they would no longer be able to meet the required safety standard required to operate the machines safely. Some users have confirmed that they have purchased their own scooter and are no longer reliant on the scheme.

In addition, following a two-year closure recent guidance issued (May 2018) by the National Fire Chiefs' Council relating to the storage of scooters within residential properties. Whilst not directly applicable to the Town Hall environment (where shop-mobility operated from), it is of relevance from a property safety perspective, rather than life safety (within residential/sleeping accommodation). [NFCC Mobility Scooter Guidance. indd \(nationalfirechiefs.org.uk\)](#)

This guidance recognises the fire ignition risks associated with the charging process and additional risks resulting from generation of hydrogen gas during the charging process, creating a potentially explosive atmosphere. The guidance also states that "*The recent use of lithium iron phosphate (LiFeP04) batteries instead of lead acid batteries to power mobility scooters **has increased risks** due to their unpredictable and adverse reaction when subjected to fire.*" The likelihood is that as equipment is replaced more lithium batteries will be introduced.

The guidance recommends additional mitigating controls which may include:

- External parking or storage areas and compartments - associated procurement costs and ongoing arson and theft/damage risks

- Internal adaptation of existing storage areas (additional fire compartmentation or increasing fire retardancy of existing compartmentation) – additional costs and ongoing inspection and maintenance
- Creation of a separate and specific charging room – significant design and construction costs

Consideration has been given to the viability of these potential additional controls as the fire escapes and evacuation of the town hall could be compromised and it cannot be deemed reasonably practicable to implement any of them at this time.

While it is not possible to operate a scooter scheme, a parking only scheme retaining the existing parking bays would be possible. This would allow people to use their own light weight scooters or wheelchairs taking advantage of a bookable parking scheme.

What specific group/s is the policy designed to affect/impact and what is the intended change or outcome for them?

Currently the service has not been in operation for circa 2 years and the change from providing scooters to shop mobility parking will affect a handful of users who do not currently own a scooter or are unable to access the Motability Scheme that could be used to buy or lease a personal scooter.

The service when it last operated was open:

Tuesday 9.00 to 3.30

Wednesday Training and Enrolment Day

Thursday 9.00 to 3.30

Friday 9.00 to 3.30

Saturday 9.00 to 3.30

The service was designed to support users who can operate a mobility scooter independently and safely. A test and training session was required prior to membership of the scheme, only those who could demonstrate that they could safely and independently operate a scooter were able to join the scheme. Allowing for safe, secure parking near the town centre.

The intention is to replace the shop mobility scheme with a shop mobility parking scheme. This will allow residents of Charnwood to book a parking bay in the existing designated shop mobility parking spaces.

For those that do not have their own scooters they will be advised that if they are in receipt of the higher mobility component of the Disability Living Allowance, enhanced rate of the Personal Independence Payment, War Pensioner's Mobility Supplement or the Armed Forces Independence Payment, the Motability Scheme may allow for the benefit to be put towards the cost of leasing or buying a personal scooter.

The Council also provides a grant to support activities at John Storer House who operate a wheel chair hire scheme.

Which groups have been consulted as part of the creation or review of the policy?

The shop mobility scheme has not operated for circa 2 years due to the impact of COVID 19.

All of the regular shop mobility customers who we held contact details for were written to as part of a consultation exercise.

Some of the past customers confirmed that they would no longer be able to use the service, others who had subsequently purchased their own scooters confirmed that they would be interested in shop-mobility parking once this was available.

● Step 3 – What we already know and where there are gaps

List any existing information/data do you have/monitor about different diverse groups in relation to this policy? Such as in relation to age, disability, gender reassignment, marriage and civil partnership, pregnancy & maternity, race, religion or belief, sex, sexual orientation etc.

Data/information such as:

- Consultation
- Previous Equality Impact Assessments
- Demographic information
- Anecdotal and other evidence

12 letters in total were sent on 26 November 2021 to the people we held data for, regular users.

No responses were received from users of the scheme following the issued letter.

Due to lack of response to the letter, further attempts were made to contact the 12 recipients.

Our findings revealed the following:

- Confirmation that some of the users sadly passed away
- One user was confirmed to being in a care home
- Four users remained uncontactable following numerous attempts
- The remaining users expressed sadness that the scheme had not returned but understood the issues that the service faced.
- 2 users confirmed that they had bought their own scooters and expressed an interest in shopmobility parking.

Of these the following data suggests:

- Most service users fell within the Charnwood area except for 1 member.
- Most of our members are of more senior years.

- It was optional for members to provide details in relation to ethnic origin, marital status, religion etc. and we don't have this data on file.

What does this information / data tell you about diverse group? If you do not hold or have access to any data/information on diverse groups, what do you need to begin collating / monitoring? (Please list)

Included in the response above

• **Step 4 – Do we need to seek the views of others? If so, who?**

Considering the answers given in Step 2, do you need to consult with specific groups to identify needs / issues? If not explain why.

Consultation was undertaken with the users of the scheme. Individual letters were sent out on Friday 26th November 2021.

Some of the needs of the residents could not be met as some of the users were unable to safely operate scooters without one-to-one support which is not possible within the scheme.

• **Step 5 – Assessing the impact**

Considering any data/consultation/information and your own knowledge, identify whether the policy has a positive or negative impact on the individuals or community groups who identify with any 'protected characteristics' and provide an explanation for your decision. Please refer to the general duties on the front page.

<p>Age</p>	<p>The Shopmobility Service catered for people of senior years.</p> <p>2 Members have already purchased their own scooters and expressed an interest in the parking scheme</p> <p>The shop-mobility parking will not change access based on age.</p> <p>However, the reduction in service will have an adverse impact on those who don't have their own scooters.</p>
<p>Disability</p> <ul style="list-style-type: none"> • Physical • Visual • Hearing • learning disabilities • mental health 	<p>The Shopmobility Service catered for people with mobility issues, but users were required to have sufficient control and movement to operate independently, to get themselves in and out of vehicles and to be able to use the scooters in a safe manner. The scheme was not intended for people who required physical support to access this service safely. In line with good practice, training was provided for those who wished to take out a scooter and a certain level of driving competency was required to allow a booking to be accepted.</p> <p>The shop-mobility parking only will not change access based on disability.</p>

	<p>However, the reduction in service will have an adverse impact on those who don't have their own scooters.</p>
Gender Reassignment (Transgender)	<p>Neutral impact - Customers were not prevented from using the Shop mobility facility due to their gender.</p> <p>The shop-mobility parking only will not change access, neutral impact created upon the protected characteristic of gender reassignment</p>
Race	<p>Neutral Impact - Customers were not prevented from using the Shop mobility facility due to their race</p> <p>The shop-mobility parking only will not change access, neutral impact created upon the protected characteristic of race</p>
Religion or Belief (Includes no belief)	<p>Neutral Impact - Customers were not prevented from using the Shop mobility facility due to their religion of belief</p> <p>The shop-mobility parking only will not change access, neutral impact created upon the protected characteristic of religion of belief</p>
Sex (Gender)	<p>Neutral Impact - Customers were not prevented from using the Shop mobility facility due to their sex</p> <p>The shop-mobility parking only will not change access, neutral impact created upon the protected characteristic of sex.</p>
Sexual Orientation	<p>Neutral Impact - Customers were not prevented from using the Shop mobility facility due to their sexual orientation</p>

	The shop-mobility parking only will not change access, neutral impact created upon the protected characteristic of sex.
<p>Other protected groups</p> <ul style="list-style-type: none"> • Pregnancy & maternity • Marriage & civil partnership 	<p>Neutral Impact - Customers were not prevented from using the Shop mobility facility due to any other protected group</p> <p>The shop-mobility parking only will not change access, neutral impact created upon any other protected groups.</p>
<p>Other socially excluded groups</p> <ul style="list-style-type: none"> • Carers • Low literacy • Priority neighbourhoods • Health inequalities • Rural isolation • Asylum seeker and refugee communities 	<p>Neutral Impact - Customers were not prevented from using the Shop mobility facility due to any other protected group</p> <p>The shop-mobility parking only will not change access, neutral impact created upon any of the socially excluded groups</p>

Where there are potential barriers, negative impacts identified and/ or barriers or impacts are unknown, please outline how you propose to minimise all negative impact or discrimination.

- If you have identified adverse impact or discrimination that is illegal, you are required to take action to remedy this immediately.
- Additionally, if you have identified adverse impact that is justifiable or legitimate, you will need to consider what actions can be taken to mitigate its effect on those groups of people.

Normal times:

Shopmobility has not been in operation for over 2 years. The closure of the scheme was due to the impact of Covid and not being able to operate the service in a safe manner during the pandemic. Customers were kept updated on the Councils position and many of the users found alternative solutions. Although the service was missed by regular customers, customers understood and respected the decision to keep the service closed in the interest of safety of staff and customers

No adverse impact was detected, and all customers were treated equally without discrimination.

When the service was last in operation the opening times where

Monday	CLOSED
Tuesday	9.00 – 3.30
Wednesday	Training and Enrolment Day
Thursday	9.00 – 3.30
Friday	9.00 – 3.30
Saturday	9.00 – 3.30
Sunday	CLOSED

Shopmobility parking time could be extended with a suitable booking system

Summarise your findings and give an overview as to whether the policy will meet Charnwood Borough Council's responsibilities in relation to equality and diversity (please refer to the general duties on the front page).

If the service was to be reopened a new venue would need to be found due to the changes in Government guidance issued (May 2018) by the National Fire Chiefs' Council relating to the storage of scooters within residential properties. Whilst not directly applicable to the Town Hall environment (where shop-mobility operated from), it is of relevance from a property safety perspective, rather than life safety (within residential/sleeping accommodation). [NFCC Mobility Scooter Guidance. indd \(nationalfirechiefs.org.uk\)](https://nationalfirechiefs.org.uk)

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● Step 6- Monitoring, evaluation, review

Are there processes in place to review the findings of this Assessment and make appropriate changes? How will you monitor potential barriers and any positive/ negative impact?

Users of the service have had the opportunity to object since the letters went out in November 2021 and non-users during the budget consultation. Users expressed an interest in gaining access to the shop mobility parking spaces.

How will the recommendations of this assessment be built into wider planning and review processes? e.g. policy reviews, annual plans and use of performance management systems.

The best way to operate the continued use of Shopmobility parking will be explored in order to operate a workable scheme moving forward.

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- **Step 7- Action Plan**

Please include any identified concerns/actions/issues in this action plan. The issues identified should inform your Service Plan and, if appropriate, your Consultation Plan

Reference Number	Action	Responsible Officer	Target Date
Step 3	Recontact members in receipt of consultation letter (Nov 21). Update on new service and the benefits Discuss whether the parking only scheme would be beneficial	Lin Machin	
Step 3	Promote changes to revised scheme if approved	Lin Machin	

- **Step 8- Who needs to know about the outcomes of this assessment and how will they be informed?**

	Who needs to know?	How they will be informed (we have a legal duty to publish EIA's)
Employees	✓ —	This EIA will be published on the website for transparency purposes and for all stakeholders to view as appropriate
Service users	✓ —	This EIA will be published on the website for transparency purposes and for all stakeholders to view as appropriate
Partners and stakeholders	✓ —	This EIA will be published on the website for transparency purposes and for all stakeholders to view as appropriate
Others		
To ensure ease of access, what other communication needs/concerns are there?		

- **Step 9- Conclusion (to be completed and signed by the **Service Head**)**

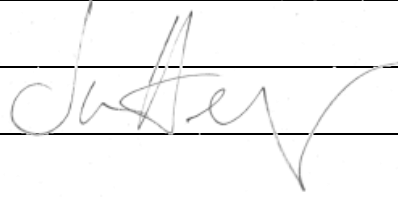
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I agree with this assessment

If *disagree*, state action/s required, reasons and details of who is to carry them out with timescales below.

Not applicable

Signed (Service Head):



Justin Henry, Strategic Director

Date: 10th February 2022

Please send completed & signed assessment to **Vicky Brackenbury** for publishing.